

HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

DANA FORD, as guardian of N.F.,
Plaintiff,

vs.

THE BOEING COMPANY and NEWCO, INC.
d/b/a CASCADE COLUMBIA
DISTRIBUTION COMPANY,
Defendants.

Case No. 2:20-cv-00463-JLR

**STIPULATION EXTENDING TIME
FOR DEFENDANT NEWCO, INC. D/B/A
CASCADE COLUMBIA
DISTRIBUTION COMPANY TO
ANSWER OR OTHERWISE RESPOND
TO COMPLAINT**

Noted for Consideration: April 28, 2020

STIPULATION

1. The parties, through counsel, stipulate and agree that good cause exists to extend the deadline for defendant New Co, Inc. d/b/a Cascade Columbia Distribution Company (“Newco”) to answer or otherwise respond to Plaintiff’s Complaint.

2. On March 27, 2020, Defendant The Boeing Company (“Boeing”) removed this case from the Superior Court of the State of Washington for King County.

3. Three other plaintiffs filed similar complaints in the Superior Court of Washington, King County, all of which Boeing also removed to this Court on March 27, 2020. They are: (a) Tianna Hatleberg, *see Hatleberg v. The Boeing Co. et al.*, U.S.D.C., W.D. Wash. Case No. 2:20-cv-00464-JLR; (b) Marie Riley, *see Riley v. The Boeing Co. et al.*, U.S.D.C.,

STIPULATION EXTENDING TIME FOR DEFENDANT
NEWCO, INC. D/B/A CASCADE COLUMBIA
DISTRIBUTION COMPANY TO ANSWER OR
OTHERWISE RESPOND TO COMPLAINT – Page 1

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W.D. Wash. Case No. 2:20-cv-00458-JLR; and (c) Ashley Wahl, *see Wahl v. The Boeing Co. et al.*, U.S.D.C., W.D. Wash. Case No. 2:20-cv-00467-JLR.

4. The Plaintiffs in each of these four cases are represented by the same undersigned plaintiffs' counsel. Newco is represented in each of the four cases by the same undersigned defense counsel.

5. The Plaintiffs filed motions to remand in each of these four cases on April 27, 2020.

6. The parties agree that it would be in the interests of efficiency, and would conserve the parties' and the Court's resources, if the parties were first to brief and resolve Plaintiff's motion to remand, and then turn to Newco's answer or potential motion to dismiss should the Court deny remand.

7. Therefore, the parties stipulate and agree that the deadline for Newco's answer or other initial response to the Complaint should be extended to twenty-one (21) days following the Court's order resolving Plaintiff's motion to remand.

IT IS SO STIPULATED:

Date: April 28, 2020

Date: April 28, 2020

/s/ Susan Ulrich
 Brian D. Weinstein, WSBA No. 24497
 Alexandra Caggiano, WSBA No. 47862
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Attorneys for Defendant Newco, Inc. d/b/a Cascade Columbia Distribution Company

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington that I am over the age of 18, and on this date I caused a copy of the foregoing **STIPULATION EXTENDING TIME FOR DEFENDANT NEWCO, INC. D/B/A CASCADE COLUMBIA DISTRIUBTION COMPANY TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT** to be served as stated below:

☒ by transmitting via electronic delivery (e-mail) the attached document(s) to the e-mail address(es) set forth below.

☒ by transmitting via electronic delivery the attached document(s) to all attorneys of record using the CM/ECF system.

Brian D. Weinstein, WSBA No. 24497 Alexandra B. Caggiano, WSBA No. 47862 Phillip A. Chu, WSBA No. 46014 Weinstein Caggiano PLLC 601 Union Street, Suite 2420 Seattle, Washington 98101 service@weinsteincaggiano.com <i>Attorneys for Plaintiff</i>	Susan Ulrich, WSBA No. 54568 Waters Kraus & Paul 222 N Sepulveda, Suite 1900 El Segundo, CA 90245 sulrich@waterskraus.com bandrews@waterskraus.com mconnett@waterskraus.com kloew@waterskraus.com <i>Attorneys for Plaintiff</i>
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I declare under penalty of perjury under the laws of the State of Washington that the above is true and correct.

DATED this 28th day of April, 2020 at Portland, Oregon.

GORDON REES SCULLY MANSUKHANI LLP

By: 
 Heather A. Coffey, Legal Assistant

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

DANA FORD, as guardian of N.F.,
Plaintiff,

vs.

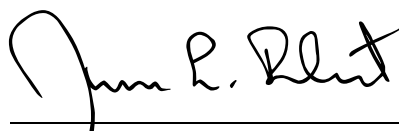
THE BOEING COMPANY and NEWCO, INC.
d/b/a CASCADE COLUMBIA
DISTRIBUTION COMPANY,
Defendants.

Case No. 2:20-cv-00463-JLR

**ORDER GRANTING EXTENSION OF
TIME FOR DEFENDANT NEWCO, INC.
D/B/A CASCADE COLUMBIA
DISTRIBUTION COMPANY TO
ANSWER OR OTHERWISE RESPOND
TO COMPLAINT**

Based on the stipulation of the parties, it is HEREBY ORDERED that the deadline for defendant Newco, Inc. d/b/a Cascade Columbia Distribution Company to answer or otherwise respond to the complaint is extended to twenty-one (21) days following the Court's order resolving Plaintiff's motion to remand.

DATED this 30th day of April, 2020.



HONORABLE JAMES L. ROBART
United States District Court Judge